

FILED

2011 AUG 30 PM 3:28

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2011 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

OYTUN AYSE MIHALIK,  
aka "Ayse Oytun Akin,"  
aka "Ayse Mihalik,"  
aka "Cindy Palmer,"

Defendant.

CR 11 00833  
CR No. 11-

I N D I C T M E N T

[18 U.S.C. § 1001(a)(2):  
False Statement]

The Grand Jury charges:

[18 U.S.C. § 1001(a)(2)]

On or about August 8, 2011, in Los Angeles County, within the Central District of California, in a matter within the jurisdiction of the Federal Bureau of Investigation ("FBI") and the Department of Homeland Security, Homeland Security Investigations ("HSI"), namely, an interview with Special Agents of the FBI and HSI at Los Angeles International Airport ("LAX"), defendant OYTUN AYSE MIHALIK also known as ("aka") "Ayse Oytun Akin," "Ayse Mihalik," and "Cindy Palmer" ("defendant MIHALIK"),

1 knowingly and willfully made material false, fictitious, and  
2 fraudulent statements and representations in a matter involving  
3 international terrorism as defined in 18 U.S.C. § 2331.

4 Specifically, defendant MIHALIK stated in the interview that:

5 (1) she had never used a name other than "Oytun Mihalik" or a  
6 similar name when using Western Union to send money to a person  
7 who was overseas; (2) she had sent money only once via Western  
8 Union to a person who was overseas; and (3) she believed that the  
9 recipient of the money she sent overseas via Western Union was a  
10 woman.

11 These statements and representations were false, fictitious,  
12 and fraudulent because, as defendant MIHALIK well knew when she  
13 made the statements during the interview at LAX, in fact the  
14 following was true: (1) defendant MIHALIK had used the alias  
15 "Cindy Palmer" when sending money via Western Union to a person  
16 who was overseas; (2) defendant MIHALIK had sent money more than  
17 once via Western Union to a person who was overseas; and (3)  
18 defendant MIHALIK believed that the recipient of the money she  
19 sent overseas via Western Union was a man.


20 These false, fictitious, and fraudulent statements and  
21 representations were made in a matter involving international  
22 terrorism, as defined in Title 18, United States Code, Section  
23 2331, namely, a matter involving acts that: (1) are violent and  
24 dangerous to human life; (2) would be violations of the criminal  
25 laws of the United States or of any State if the acts occurred  
26 within the jurisdiction of the United States or of any State; (3)  
27 are intended to intimidate and coerce a civilian population,  
28 influence the policy of a government by intimidation and coercion,

1 and affect the conduct of a government by mass destruction,  
2 assassination, and kidnapping; and (4) occur primarily outside the  
3 territorial jurisdiction of the United States.

4 A TRUE BILL

5  
6 /s/  
7 Foreperson

8 ANDRÉ BIROTTE JR.  
9 United States Attorney

10 

11 ROBERT E. DUGDALE  
12 Assistant United States Attorney  
13 Chief, Criminal Division

14 PATRICK R. FITZGERALD  
15 Assistant United States Attorney  
16 Chief, National Security Section

17 JUDITH A. HEINZ  
18 Assistant United States Attorney  
19 Deputy Chief, National Security Section  
20  
21  
22  
23  
24  
25  
26  
27  
28